

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
Lafayette Division

EDWARD C. ABELL, et al.,	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
	)	6:22-cv-01353
U.S. ARMY CORPS OF ENGINEERS, et	)	(JDC/CBW)
al.,	)	
Defendants.	)	

---

**DEFENDANTS' MOTION TO TRANSFER TO THE DISTRICT OF ALASKA**

Pursuant to 28 U.S.C. § 1404(a), Defendants, the U.S. Army Corps of Engineers, Christine Wormuth, in her official capacity as Secretary of the Army, and Scott A. Spellmon, in his official capacity as Chief of Engineers and Commanding General of U.S. Army Corps of Engineers, through undersigned counsel, hereby respectfully move this Court to transfer this matter to the District of Alaska. The grounds for this motion are fully explained in the memorandum of law filed with the motion.

Respectfully submitted,

BRANDON B. BROWN  
UNITED STATES ATTORNEY

s/ Karen J. King  
KAREN KING (LA BAR #23508)  
Assistant U.S. Attorney  
800 Lafayette Street  
Suite 2200  
Lafayette, LA 70501-6832  
Telephone: (337) 262-6313  
E-mail: [karen.king@usdoj.gov](mailto:karen.king@usdoj.gov)

DATE: July 25, 2022

TODD KIM  
ASSISTANT ATTORNEY GENERAL  
Environment and Natural Resources Division

/s/ Kimere J. Kimball  
KIMERE J. KIMBALL (T.A.)  
USDOJ ENRD/EDS  
P.O. Box 7611  
Washington, DC 20044-7611  
Telephone: (202) 514-2285  
Fax: (202) 514-8865  
E-mail: [Kimere.kimball@usdoj.gov](mailto:Kimere.kimball@usdoj.gov)  
Counsel for Defendant